SERFF Tracking Number: INGD-127125951 State: Arkansas State Tracking Number: 48514 Filing Company: ING Life Insurance and Annuity Company

Company Tracking Number: E-LIF-10(XC)

TOI: Sub-TOI: A02.1G.002 Flexible Premium A02.1G Group Annuities - Deferred Non-

Variable and Variable

E-LIF-10(XC) Product Name:

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

Filing at a Glance

Company: ING Life Insurance and Annuity Company

SERFF Tr Num: INGD-127125951 State: Arkansas Product Name: E-LIF-10(XC)

State Tr Num: 48514 TOI: A02.1G Group Annuities - Deferred Non-SERFF Status: Closed-Approved-

Variable and Variable Closed

Sub-TOI: A02.1G.002 Flexible Premium Co Tr Num: E-LIF-10(XC) State Status: Approved-Closed

Filing Type: Form Reviewer(s): Linda Bird

Authors: Nancy Pare, Patricia

Smith, Melissa Cheyney

Date Submitted: 04/18/2011 Disposition Status: Approved-

Deemer Date:

Closed

Disposition Date: 04/20/2011

Implementation Date Requested: On Approval Implementation Date:

State Filing Description:

General Information

Project Name: E-LIF-10(XC) Status of Filing in Domicile: Pending

Project Number: E-LIF-10(XC) Date Approved in Domicile:

Requested Filing Mode: Review & Approval Domicile Status Comments: Our domiciliary

state of Connecticut has been filed

simultaneously and is pending approval.

Explanation for Combination/Other: Market Type: Group

Submission Type: New Submission Group Market Size: Small and Large

Group Market Type: Employer Overall Rate Impact:

Filing Status Changed: 04/20/2011

Created By: Melissa Cheyney Submitted By: Melissa Cheyney

Corresponding Filing Tracking Number:

State Status Changed: 04/20/2011

Filing Description:

RE: ING Life Insurance and Annuity Company

NAIC #229-86509, FEIN #71-0294708

Endorsement: E-LIF-10(XC)

ING Life Insurance and Annuity Company (ILIAC) is submitting the above-captioned form for the Department's review

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

and approval. The endorsement is new and contains no unusual or possibly controversial items from normal company or industry standards.

The endorsement is designed for use with the following group combination deferred annuity contracts and certificates, if applicable, (or a state specific version thereof) if such forms were previously approved by your Department: contract and certificate G-CDA(12/99) and C-CDA(12/99) as well as contract and certificate G-CDA-10 and C-CDA-10. In addition, Form E-LIF-10(XC) will endorse any other approved form we may have inadvertently omitted from the above list and future Department approved group variable, fixed, or combination annuity contracts and certificates.

The endorsement provides that the Loan Account will be credited with interest at a rate equal to the Loan Interest Rate. This replaces language indicating that the credited rate for the Loan Account will be no less than the Loan Interest Rate, less 2.5%, on an annual basis. In addition, the endorsement changes the previous loan language which indicated that the Loan Interest Rate on all ERISA loans was adjustable. The endorsement provides that only those Loans with an initial Loan Interest Rate greater than 8% will be adjustable. If the initial Loan Interest Rate is 8% or less, the Loan Interest Rate will be fixed for the term of the loan. The endorsement also provides for a Loan Initiation Fee.

The endorsement is submitted in final printed form, subject to only minor modification in paper stock, ink, border, company logo, typographical errors, adaptation to computer printing and the possible inclusion of a barcode.

We would like to begin using this endorsement as soon as possible and will appreciate review at your earliest convenience. If you have any questions or require additional information, please contact me at (860) 580-2801, toll free at (800) 654-8065 or at melissa.cheyney@us.ing.com. Thank you for your consideration.

Company and Contact

Filing Contact Information

Melissa Cheyney, Contract Analyst Melissa.Cheyney@us.ing.com

One Orange Way 860-580-2801 [Phone] Windsor, CT 06095-4774 860-580-4844 [FAX]

Filing Company Information

ING Life Insurance and Annuity Company CoCode: 86509 State of Domicile: Connecticut

One Orange Way Group Code: 229 Company Type: Windsor, CT 06095 Group Name: State ID Number:

(800) 654-8065 ext. [Phone] FEIN Number: 71-0294708

 SERFF Tracking Number:
 INGD-127125951
 State:
 Arkansas

 Filing Company:
 ING Life Insurance and Annuity Company
 State Tracking Number:
 48514

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

Filing Fees

Fee Required? Yes

Fee Amount: \$50.00

Retaliatory? No

Fee Explanation: 1 endorsement @ \$50

Per Company: No

COMPANY AMOUNT DATE PROCESSED TRANSACTION #

ING Life Insurance and Annuity Company \$50.00 04/18/2011 46673030

 SERFF Tracking Number:
 INGD-127125951
 State:
 Arkansas

 Filing Company:
 ING Life Insurance and Annuity Company
 State Tracking Number:
 48514

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-	Linda Bird	04/20/2011	04/20/2011
Closed			

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

Disposition

Disposition Date: 04/20/2011

Implementation Date: Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Supporting Document

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

ScheduleSchedule ItemSchedule Item StatusPublic AccessSupporting DocumentFlesch CertificationYesSupporting DocumentApplicationNo

No

Form Endorsement Yes

Life & Annuity - Acturial Memo

 SERFF Tracking Number:
 INGD-127125951
 State:
 Arkansas

 Filing Company:
 ING Life Insurance and Annuity Company
 State Tracking Number:
 48514

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

Form Schedule

Lead Form Number: E-LIF-10(XC)

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	E-LIF- 10(XC)	Policy/Cont Endorsement ract/Fratern al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	E-LIF- 10(XC).pdf

ING Life Insurance and Annuity Company

ENDORSEMENT

This Contract, and the Certificate, if applicable, are endorsed as follows.

1. Delete the **Loan Account** provision and replace with the following:

The **Loan Account**: An accounting device used to keep a record of loan activity. For each loan, an amount equal to the loan amount is transferred from the Investment Options in which the Individual Account is invested and is credited to the Loan Account. The Loan Account is then credited with interest at a rate equal to the Loan Interest Rate.

2. The **Loan Interest Rate** provision is deleted and replaced with the following:

Loan Interest Rate: The Company will set a Loan Interest Rate on the first business day of each month. The interest rate will be equal to the Moody's Average Corporates for the calendar month beginning two months before the Loan Interest Rate is effective.

If the interest rate is 8% or less, the rate will be fixed for the term of the loan.

An adjustable interest rate will be applied if the initial interest rate exceeds 8%. The initial interest rate will be effective for a period of not less than three months and not more than one year. The initial interest rate and the period for which it will apply will be specified in the loan agreement. For each subsequent period, the interest rate is adjusted if the new rate is at least 0.5% higher or lower than the current rate. We will provide Participants with reasonable notification of any change in the Loan Interest Rate.

3. Add the following:

Loan Initiation Fee: Loans which are effective on and after the effective date of this endorsement will be subject to a fee for loan initiation. This fee will not exceed \$100 per loan. The initiation fee will be deducted from the vested Individual Account value during the first month of the loan period.

The Company reserves the right to change the fees charged for loan initiation, but not to exceed \$100 per loan.

Endorsed and made a part of the Contract, and the Certificate, if applicable, on the Effective Date of the Contract and Certificate.

President

ING Life Insurance and Annuity Company

Cign_

Company Tracking Number: E-LIF-10(XC)

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium

Variable and Variable

Product Name: E-LIF-10(XC)

Project Name/Number: E-LIF-10(XC)/E-LIF-10(XC)

Supporting Document Schedules

Item Status: Status

Date:

Satisfied - Item: Flesch Certification

Comments:

Attached is the compliance certification.

Attachment:

AR Cert.pdf

STATE OF ARKANSAS

CERTIFICATION OF COMPLIANCE

CARRIER: ING Life Insurance and Annuit	y Company
FORM NUMBER(S)	FORM TITLE(S)
E-LIF-10(XC)	Endorsement
I hereby certify that to the best of my knowledge an with Rule and Regulation 19s10 as well as all applied	<u>-</u>
Melisia V. Cheyney	
Signature of Officer or Representative	_
Melissa V. Cheyney	
Name	_
Contract Analyst	
Title and/or Business Affiliation	_
April 18, 2011	
Date	_